

Application granted only to the extent the parties seek additional time to file a proposed jury charge, proposed verdict sheet, and proposed voir dire. That deadline is extended to March 27, 2023.

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Plaintiff's additional requests are denied.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 146.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
March 16, 2023

**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re: Consent Motion 1) to Extend Time to Submit Jury Charge, Verdict Form, and Voir Dire & 2) to Adjourn Trial Ready Date**  
*Liang v. Master Wok, Inc.*, No. 21-cv-07163 (PKC) (RLM), (E.D.N.Y.)

Your Honor,

We represent the Plaintiff in the above-referenced matter. We write respectfully, and with the consent of Defense counsel, (1) to request until March 27, 2023 to submit a jury charge, verdict sheet, and voir dire, and (2) to adjourn the trial ready date of March 20, 2023 to accommodate (a) Plaintiff's counsel's appearances in other matters, including numerous other trials, and (b) Defendants' March 15, 2023 request for a settlement conference, to the extent it is granted.

The parties have jointly prepared a pretrial order, but require additional time to prepare a joint jury charge with citations to authority along with a verdict sheet and proposed voir dire. Plaintiff's counsel in particular was occupied with, among other things, a trial before Judge Daniels in the matter *Chen v. Hunan Manor Enterprise, Inc. et al*, No. 17-cv-00802 that ran overlong—February 13–16 as scheduled, then March 2, then March 7, and finally March 13, 2023—as well as a trial-turned-all-day-settlement conference in Queens County Supreme Court in the matter *Dong v. J. Yang Acupuncture, Inc.*, No. 701456/2016 on March 10, 2023. Accordingly, we respectfully request an additional 12 days (8 business days) to complete the jury charge, verdict sheet, and voir dire.

On February 23, 2023, the Court placed the parties on five days' trial readiness notice as of March 15, 2023. *See* Min. Entry Feb. 23, 2023 (re: conference held February 2, 2023). However, several other courts have scheduled trials in which Plaintiff's counsel must appear that impact the trial readiness period: in the District of Connecticut in the matter *Lu v. Diamond Nail Salon, LLC*, No. 19-cv-02017 beginning March 20, 2023 (ordered February 23, 2023); in the Bankruptcy Court for the Eastern District of New York in the matters *Jiao v. Wu*, No. 21-ap-01035, *Jiao v. Zou*, No. 21-ap-01036, and *Jiao v. Fan*, No. 21-ap-01037 on March 28 and 29, 2023 (ordered January 13, 2023); in the Supreme Court of Ulster County for the matter *Dass v. 1364 9W Gas & Mart Corp.*, No. EF2021-109 beginning April 17, 2023 (ordered July 21, 2022); and in the District of New Jersey for the matter *Goh v. Nori O, Inc.*, No. 16-cv-02811 beginning May 1, 2023 (ordered February 10, 2023). Accordingly, we respectfully request that trial of this matter not be held the weeks beginning March 20, 2023, March 27, 2023, April 17, 2023, or May 1, 2023. And to the extent the Defendants' request for a settlement conference with the magistrate judge is granted, it be scheduled during the weeks of April 3, April 10, or April 24, 2023.

Hon. Philip M. Halpern, U.S.D.J.

March 15, 2023

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We thank the Court for its attention to and consideration of this matter.

Respectfully submitted,

TROY LAW, PLLC

/s/ Aaron B. Schweitzer

Aaron B. Schweitzer

*Attorney for Plaintiffs*

cc: via ECF

all counsel of record

/asb